

## **Department of Energy**

Richland Operations Office P.O. Box 550 Richland, Washington 99352

01-ERD-019

DEC 21 2000

Ms. Jane A. Hedges
Cleanup Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336



**EDMC** 

Dear Ms. Hedges:

TRANSMITTAL OF "200-PW-2 URANIUM-RICH PROCESS WASTE GROUP OPERABLE UNIT RI/FS WORK PLAN AND RCRA TSD SAMPLING PLAN," DOE/RL-2000-60, DRAFT A

Attached is a copy of the subject document for review and comment by the State of Washington Department of Ecology (Ecology). Transmittal of this work plan satisfies the Hanford Federal Facility Agreement and Consent Order Milestone M-13-25 for submittal of the 200-PW-2 Operable Unit Remedial Investigation (RI)/Feasibility Study (FS) work plan and Resource Conservation and Recovery Act of 1976 (RCRA) treatment, storage, and disposal (TSD) Unit Sampling Plan to Ecology by December 31, 2000. This document also supports meeting an associated outyear milestone: Milestone M-20-33, which requires submittal of the 216-A-10 Crib, and 216-A-36B Crib closure/post-closure plans to Ecology by October 31, 2003.

This work plan is the fifth in a series of several which follow the streamlined approach outlined in the 200 Areas RI/FS Implementation plan, Environmental Restoration Program, for characterization and remediation in the 200 Areas. The work plan contains the elements of a Comprehensive Environmental Response, Compensation and Liability Act of 1980 RI/FS work plan and RCRA TSD unit sampling plan. The sampling and analysis plan and waste control plan accompany the work plan as appendices.

The data quality objectives (DQOs) process for this work plan was conducted during June through August of this year and included several workshops/discussions with regulators. The draft DQO summary report (BHI-01411) was provided to Ecology for review on August 8, 2000. No comments have been received to date. Since that time, the report has been updated and changes made in the current draft were provided to Ecology on November 22, 2000. The regulator review period for the Draft version of the 200-PW-2 work plan is scheduled from January 2, 2001, to January 31, 2001.

Also attached please find a draft Federal Facility Agreement and Consent Order Change Request proposing interim milestones to be negotiated between the U.S. Department of Energy, the U.S. Environmental Protection Agency and Ecology. Please provide comments on the draft change request along with any comments made on the Draft A version of the work plan.

If you have any questions, please contact Bryan L. Foley, Environmental Restoration Division, on (509) 376-7087.

Sincerely

Clifford E. Clark, Acting Program Manager

Office of Regulatory Liaison

**ERD:BLF** 

## Attachments

cc w/attachs:

J. H. Richards, CTUIR

J. Price, Ecology

R. R. Skinnarland, Ecology

R. F. Stanley, Ecology

M. A. Wilson, Ecology

L. C. Treichel, EM-442

D. R. Sherwood, EPA

J. S. Hertzel, FHI

O.S. Kramer, FHI

M. B. Reeves, HAB

P. Sobotta, NPT

M. L. Blazek, Oregon Energy

R. Jim, YN

Administrative Record, H6-08 (200-PW-2)

cc w/o attachs:

B. H. Ford, BHI

M. J. Graham, BHI

C. D. Wittreich, CHI

DRAFT Federal Facility Agreement and Consent Order **Change Control Form** Date **Change Number** Do not use blue ink. Type or print using black ink. December 12, 2000 M-15-00-06 Originator Phone Bryan Foley, DOE 376-7087 Class of Change [ ] III - Project Manager [] I - Signatories J X) II – Executive Manager Change Title Interim Milestones for 200-PW-2 Operable Unit (Uranium Rich Process Waste Group) Assessment Activities Description/Justification of Change The 200 Areas Remedial Investigation/Feasibility Study (RI/FS) Implementation Plan (DOE/RL-98-28, Rev.0) established the framework for characterization of ER soil waste sites in the 200 Areas and grouped the waste sites into 23 process-based operable units (OUs). Based on the Implementation Plan, Tri-Party Agreement M-13 milestones were established (TPA Change Request M-13-97-01) for the submittal of RI/FS work plans for individual OUs. The 200-PW-2 OU RI/FS work plan was assigned to Tri-Party Agreement interim milestone M-13-25 (TPA Change Request M-13-99-01) which was met with the submittal of the 200-PW-2 Draft A Work Plan. As specified in the Tri-Party Agreement, Section 11.6 work plans must specify interim milestones for the OU that identify completion dates for major tasks and deliverables specified in the work plans. The 200-PW-2 OU work plan includes a project schedule with target project milestones. Based on this work plan schedule, the following interim milestones are proposed under the Tri-Party Agreement to implement the activities for the RI/FS process for this OU: M-15-43A: Complete 200-PW-2 OU Field Work through Sample Collection and Analysis - September 30, 2002 M-15-43B: Submit 200-PW-2 OU Draft A Remedial Investigation Report to Ecology - June 30, 2003 M-15-43C: Submit 200-PW-2-OU Draft A Feasibility Study/Closure Plan and Draft A Proposed Plan/Permit Modification to Ecology - December 31, 2004. These interim milestone dates are consistent with the major milestone M-15-00C to complete the 200 Area operable unit RI/FS process by 2008. Impact of Change. Addition of interim milestones under M-15-00C. Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended. 200-PW-2 Uranium-Rich Process Waste Group Operable Unit RI/FS Work Plan and RCRA TSD Unit Sampling Plan

(DOE/RL-2000-60).

## DRAFT

Change Number M-15-00-06	Federal Facility Agreement and Consent O Change Control Form Do not use blue ink. Type or print using black ink.		Date December 12, 2000
Approvals			
	·	Approved	Disapproved
DOE	Date		
<del></del>		Approved	Disapproved
EPA	Date		
Ecology	Date	Approved	Disapproved